<u>REMARKS</u>

As a preliminary matter, Applicants appreciate the Examiner's indication that Claims 35-42 and 55-62 have been allowed.

Claims 23-34 and 43-54 stand rejected under 35 U.S.C. § 102 (b) as being anticipated by United States Patent No. 5,182,661 to Ikeda et al. Applicants respectfully traverse this rejection.

Applicants respectfully submit that the Ikeda et al. reference does not disclose all of the features of the present invention. More specifically, the device of Ikeda et al. fails to include the first and second contact holes and the first, second and third conducting films, which are all formed "outside an image display region in which the plurality of picture element electrodes are formed," as defined in independent Claims 23, 29, 43 and 49. Further, the device of Ikeda et al. fails to include a first conducting film that is, at least indirectly, connected to a second conducting film.

One example of an embodiment of the present invention defined in independent Claims 23, 29, 43 and 49 is shown in Applicants' Figure 26 (which shows sectional views of Figure 25, which is an enlarged view of a portion of Figure 24). Figure 26 shows first contact hole 27b, second contact hole 27a, first conducting film 26a, second conducting film 24b and third conducting film 25. The right hand portion of Figure 26, where each of these features are shown, is a sectional view taken along line B-B' of Figure 25. As can be seen by comparing Figure 25 with Figure 24, the entirety of Figure 25 (and

thus the entirety of Figure 26) shows features that are outside of the image display region 12 (Figure 24).

In contrast, in the device of Figures 3A, 3B, 4A and 4B of Ikeda et al., the following features --contact hole 66, contact hole 64, first storage capacitor electrode 60, second storage capacitor electrode 62 and pixel electrode 22 (which the Examiner equated with the claimed first and second contact holes and the first, second and third conducting films, respectively)-- are all located in the areas adjacent to the picture element electrodes, i.e., <u>inside</u> of the image display region. Accordingly, these features do not satisfy the portion of independent Claims 23, 29, 43 and 49 that recites that these features are "<u>outside</u> an image display region in which the plurality of picture element electrodes are formed" (emphasis added). Thus, for at least this reason, Applicants respectfully request the withdrawal of this §102(b) rejection of independent Claims 23, 29, 43 and 49 and associated dependent Claims 24-28, 30-34, 44-48 and 50-54.
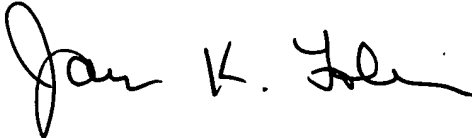
Additionally, Applicants also respectfully request the withdrawal of this because, in each of the claims at issue, the first conducting film is connected to the third conducting film and the third conducting film is connected to the second conducting film. Thus, the first conducting film is accordingly (at least indirectly) connected to the second conducting film. In contrast, in the Ikeda et al. reference, the first storage capacitor electrode 60 (which the Examiner equated with the claimed first conducting film) and the second storage capacitor electrode 62 (which the Examiner equated with the claimed second conducting film) each constitute a capacitor. Accordingly, in the device of Ikeda et al.,

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electrode 60 <u>must not</u> be connected to electrode 62. Thus for this reason also, Applicants respectfully request the withdrawal of this §102(b) rejection of independent Claims 23, 29, 43 and 49 and associated dependent Claims 24-28, 30-34, 44-48 and 50-54.

For all of the above reasons, Applicants request reconsideration and allowance of the claimed invention. Should the Examiner be of the opinion that a telephone conference would aid in the prosecution of the application, or that outstanding issues exist, the Examiner is invited to contact the undersigned.

Respectfully submitted,

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